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UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE DIVISION

JALINN WIGGINS,

Plaintiff,

v.

LYFT, INC. a foreign corporation; LYFT,
INC., dba Lyft Washington, inc., a
foreign corporation; SEYDINA GUEYE
and JANE DOE GUEYE, individually
and the marital community comprised
thereof,

Defendants.

No.: 2:24-cv-01440 MJP

STIPULATED MOTION AND ORDER
TO EXTEND TIME TO DISCLOSE
EXPERT WITNESSES

NOTED ON THE MOTION
CALENDAR ON DATE FILED AS A
SAME DAY MOTION PURSUANT TO
7(d)(1)

STIPULATION

Defendants Seydina Gueye and Jane Doe Gueye respectfully requests a 30-day extension of the initial deadline to disclose reports from expert witnesses under FRCP 26(a)(2). Plaintiff Jalinn Wiggins consents and agrees to this request.

Defendants Gueye seek this additional time in order to depose Plaintiff and select experts in accord with Plaintiff's testimony. Defendants first request for Plaintiff's deposition was made on June 3, 2025. Defendant made stipulated requests and subpoenas of records on March 10, 2025; however, responses are still outstanding

1 for Associated EMG Physicians; Sellwood Chiropractic Clinic; and employment
2 records from AMG Healthcare. Defendants Gueye respectfully ask for this 30-day
3 extension in order to fully evaluate the Plaintiff's claims and select experts.

4 Accordingly, there is good cause under Federal Rule of Civil Procedure 6(b) and
5 local Civil Rule 10(g) for a 30-day continuance of the deadline to provide reports from
6 expert witnesses under FRCP 26(a)(2).

7 The parties, through their counsel request and stipulate to the following
8 proposed extension of the deadline in the Court's Order Setting Trial Date & Related
9 Dates.

Event	Original Deadline	New Deadline Requested
Reports from expert witness under FRCP 26(a)(2) due	June 16, 2025	July 16, 2025

10 The parties have also discussed and agreed that, as a condition to Plaintiff
11 consenting to Defendants' request for additional time to disclose expert witnesses,
12 this stipulated request does not serve as a basis for a continuance of Plaintiff's
13 pending motion for summary judgment on the issues of his past medical special
14 damages and Defendants' affirmative defenses, which is set to be heard on June 27,
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1 2025. Defendant is not precluded from opposing the motion for summary judgment
2 in part on the fact that discovery has not been completed.

3 DATED: June _____, 2025
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5 MALONEY LAUERSDORF 6 REINER, PC	DAVIS LAW GROUP, PS
7 By: <i>/s/ Katie D. Buxman</i> 8 Katie D. Buxman, WSBA #32867	By: <i>/s/ David M. Reeve</i> 9 David M. Reeve, WSBA #48405
Attorneys for Defendants Gueye	Attorneys for Plaintiff Wiggins

10 **ORDER**
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12 IT IS SO ORDERED this 6, day of June, 2025.

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15 THE HONORABLE MARSHA J. PECHMAN
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CERTIFICATE OF SERVICE

I hereby certify that on June 5, 2025, I served the foregoing STIPULATION AND ORDER TO EXTEND TIME FOR DEFENDANTS GUEYE TO DISCLOSE EXPERT WITNESSES on the following parties at the following address:

David Reeve Davis Law Group, PS 2101 4 th Ave. #1030 Seattle, WA 98121 P: 206-727-4000 F: 206-727-4001 david@davislawgroupseattle.com Of Attorneys for Plaintiff	
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by mailing a copy thereof, placed in a sealed envelope addressed as listed above and deposited in the United States mail at Portland, Oregon, and that postage thereon was fully prepaid.

by electronic service through the court's eFiling system. Service was accomplished at the party's email address as recorded on the date of service in the eFiling system.

by facsimile transmission to the fax number shown above.

by email transmission to the email address shown above.

by hand delivering a copy thereof, to the address listed above.

MALONEY LAUERSDORF REINER, PC

By Katie Buxman
Katie D. Buxman WSBA #32867
Email: kb@mlrlegaltteam.com

Of Attorneys for Defendants Gueye